



Canyon Fuel Company, LLC
 SUFCO Mine
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 Salina, UT 84654
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RECEIVED

February 7, 2000

FEB 07 2000

DIVISION OF
 OIL, GAS AND MINING

Utah Coal Program
 Utah Division of Oil, Gas & Mining
 1594 West North Temple, Suite 1210
 P. O. Box 145801
 Salt Lake City, UT 84114-5801

Re: Second Submittal, Link Canyon Substation #2 Relocation, Canyon Fuel Company, LLC, SUFCO
 Mine M&RP ACT/041002-AM99G

Dear Permit Supervisor:

041/002

Incoming

The enclosed copies of materials are being submitted to update the Link Canyon Substation Relocation amendment submitted on November 23, 1999. Attached are DOGM forms C-1 and C-2 and appropriate pages and Plates 3-3 and 5-2E for modification of the Link Canyon Substation Revision Amendment to the MRP.

These pages and Plates 3-3 and 5-2E have been revised to address the deficiencies in the Division letter dated January 20, 2000, and need to replace the pages in the original submittal binder.

The deficiencies and responses to the Link Canyon Substation are:

1. **R645-301-322**

- ♦ According to information from the Division of Wildlife Resources, golden eagle nest 31 is not shown in the correct location on Plate 3-3. The applicant needs to confirm the location of this nest and modify Plate 3-3 if necessary.

Response: *Plate 3-3 has been modified and updated to reflect the new numbering system that the DWR is using now on their raptor surveys. Text pages 3-6 and 3-7 have been updated for the new 1999 Raptor Survey which is included in Appendix 3-4 of the MRP.*

2. **R645-301-120, R645-301-222, and R645-301-223**

- ♦ The survey report does not include laboratory analyses results or a discussion on soil chemical characterization. There are inconsistencies between the text and Soils Map A within the Order 1 soil survey for soil descriptions, map units and soil families.

Response: *A discussion regarding the results of the sample analysis of the soils obtained by EIS in October 1999 has been attached to Appendix 2-6. The inconsistencies between the text and Soils Map A have been corrected.*

3. **R645-301-224 and R645-301-232.200**

- ♦ Soil Unit D side-cast soil materials need to be sampled and characterized for suitability as substitute topsoil since native topsoil is scarce and salvage of native soils provides very limited topsoil resources available for soil redistribution.

Response: *A soils pit was excavated in Soils Unit D on January 28, 2000. A description of the soil was obtained as well as samples of the two soils identified in the pit. The samples have been shipped to IML in Sheridan Wyoming but analysis results are not expected for 3 to 4 weeks. Since this material originated from the deeper soils of Soil Unit B, SUFCo has assumed at this time material will be suitable for reclamation. If, for any reason, the results of the analysis of these soils indicate they are not suitable for reclamation, SUFCo will take steps to repair the situation.*

4. **R645-301-333**

- ♦ The applicant should commit to not begin construction during the raptor nesting season unless surveys show that nests within one-half mile of the disturbance are not being used.

Response: *The commitment for the construction activity during the raptor nesting season has been revised on pages 3-34 and 3-35 in the MRP.*

5. **R645-301-231.100**

- ♦ An on-site soils specialist qualified in making field soil salvage determinations should be present during soil salvage operations.

Response: *SUFCo has committed to have a qualified person on site during construction to observe and direct the removal and storage of soils.*

6. **R645-301-232.200, R645-301-232.720 and R645-301-233**

- ♦ Provide additional soil resources to meet revegetation requirements. Based on soil suitability findings, Unit-D side cast soil materials may provide additional substitute topsoil resource material to augment the limited amounts of native, undisturbed topsoil resources. If adequate quantities of substitute topsoil resources cannot be obtained from the site, then soil borrow will be needed.

Response: *As discussed in a meeting between Division and CFC personnel on January 27, 1999, all available soils will be used during final reclamation to return the site to AOC and for revegetation. The site was disturbed prior to SMCRA and no soil salvage occurred. However, the results of excavating a soil pit in Soil Unit D indicate additional soils beyond what was originally assumed in the EIS report will be available for final reclamation. SUFCo has committed to salvaging all available suitable soils.*

7. **R645-301-742**

- ♦ The designs are unclear (page 7-28) as to the route the undisturbed runoff takes after leaving the undisturbed drainage ditch, whether it flows down the road or across the road. In either case, the applicant should provide information on both the drainage course and erosion protection of the channel.

Response: *Text has been added on page 7-28 to clarify the route the undisturbed runoff takes after leaving the undisturbed drainage ditch. Plate 5-2E has been revised to show the flow route of the existing Link Canyon Road ditch. Diversion drainage runoff and erosion protection calculations and designs are located in Appendix 7-12 of the MRP.*

8. **R645-301-742**

- ♦ Plate 5-2E needs to show how water will be prevented from flowing down the pad access road. If there is any potential for water from the pad to overtop the water containment berm, sediment control measures must be developed to prevent off-site migration.

Response: Plate 5-2E has been revised to show the flow route of the existing Link Canyon Road ditch. Water flow down the pad access road area sediment control and runoff calculations are located in Appendix 7-15 as Alternate Sediment Control Area #7 (ASCA #7). The spill prevention containment berm around the substation pad area was designed to contain the required 10 year storm event and the total amount of oil contained in the transformer if it ever had a leak along with the required 0.3 feet of freeboard.

9. **R645-301-242.110**

- ◆ Provide additional soil resources to meet adequate revegetation requirements consistent with the approved post-mining land use.

Response: See responses to deficiencies 3 and 6.

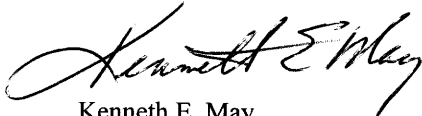
10. **R645-301-341**

- ◆ The applicant will be responsible for revegetation of the entire site, and it is not clear from information in the application whether it will be possible to successfully revegetate areas previously disturbed by mining using the proposed plan. The application needs to include adequate soil information to make this determination, and it is doubtful whether vegetation can be successfully established on weathered sandstone and shale or on just 1.8 inches of topsoil over this kind of material.

Response: As stated in the responses to deficiencies 3 and 6, SUFCo is committed to salvaging all available suitable soils for reclamation. The additional volume of soil found in Soil Unit D should significantly increase the volume of soils available for reclamation. A conservative estimate of 118 CY of soils available for reclamation of the disturbed area has been calculated based on the recent site investigation. The disturbed acreage is approximately 5,227 square feet. A cover of approximately 7.3-inches will result from the 118 CY. As stated previously, the 118 CY is a conservative estimate and additional soils are anticipated to be available.

If you have any questions or need additional information, please contact Mike Davis at (435) 286-4880.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCO Mine



Kenneth E. May
General Manager

Encl.

KEM/MLD:kb

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APPLICATION FOR PERMIT PROCESSING

Permit Change <input checked="" type="checkbox"/>	New Permit <input type="checkbox"/>	Renewal <input type="checkbox"/>	Transfer <input type="checkbox"/>	Exploration <input type="checkbox"/>	Bond Release <input type="checkbox"/>	Permit Number: ACT/041/002
Title of Proposal: AM99G Second Submittal - Link Canyon Substation Relocation Amendment						Mine: SUFCO MINE
						Permittee: CANYON FUEL CO., LLC

Description, include reason for application and timing required to implement: Due to encountering burned coal, voids, and high temperatures the Link Canyon Substation needs to be relocated. SUFCO Mine needs approval as soon as possible to be able to install the substaion this year.

Instructions: If you answer yes to any of the first 8 questions (gray), this will be a Significant Revision and will require Public Notice.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Change in the size of the Permit Area? _____ acres Disturbed Area? <u>0.21</u> acres <input checked="" type="checkbox"/> increase <input type="checkbox"/> decrease.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the application submitted as a result of a Division Order? DO #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	3. Does application include operations outside a previously identified Cumulative Hydrologic Impact Area?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	4. Does application include operations in hydrologic basins other than as currently approved?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	5. Does application result from cancellation, reduction or increase of insurance or reclamation bond?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	6. Does the application require or include public notice/publication?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	7. Does the application require or include ownership, control, right-of-entry, or compliance information?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	9. Is the application submitted as a result of a Violation? NOV #
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	10. Is the application submitted as a result of other laws or regulations or policies? Explain:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	11. Does the application affect the surface landowner or change the post mining land use?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2?)
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	13. Does the application require or include collection and reporting of any baseline information?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	15. Does application require or include soil removal, storage or placement?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	16. Does the application require or include vegetation monitoring, removal or revegetation activities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	17. Does the application require or include construction, modification, or removal of surface facilities?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	18. Does the application require or include water monitoring, sediment or drainage control measures?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	19. Does the application require or include certified designs, maps, or calculations?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	20. Does the application require or include subsidence control or monitoring?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	21. Have reclamation costs for bonding been provided for?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	22. Does application involve a perennial stream, a stream buffer zone or discharges to a stream?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	23. Does the application affect permits issued by other agencies or permits issued to other entities?

☐ Attach _____ complete copies of the application.

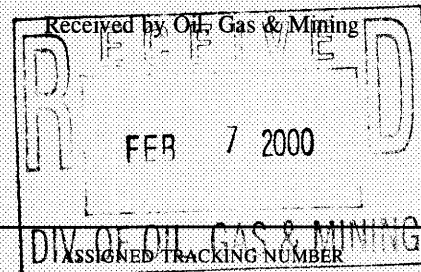
I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

Signed - Kenneth E. May 2/7/00
 Subscribed and sworn to before me this 7th day of February, 2000
Ella Ruth Wayman
 Notary Public

My Commission Expires: _____, 19____
 Attest: STATE OF _____
 COUNTY OF _____



NOTARY PUBLIC
ELLA RUTH WAYMAN
 30 North 500 West
 Aurora, Utah 84620
 My Commission Expires
 March 19, 2003
STATE OF UTAH



Application for Permit Processing

Detailed Schedule of Changes to the MRP

Title of Application: AM99G - Second Submittal - Link Canyon Substation Relocation
Amendment.

Permit Number: ACT/041/002

Mine: SUFCO MINE

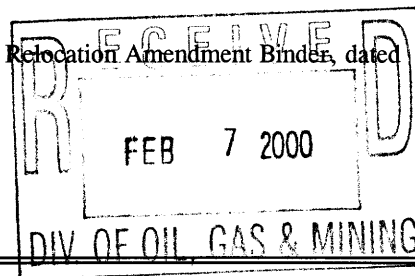
Permittee: CANYON FUEL CO., LLC

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 2-11 and 2-14 in Chapter 2, of Link Canyon Amendment Binder.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 3-6 to 3-7A, in Chapter 3, of Link Canyon Amendment Binder.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 3-34 to 3-35A in Chapter 3, of Link Canyon Amendment Binder.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Page 5-41, in Chapter 5, of Link Canyon Amendment Binder.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 7-28 to 29A, of Link Canyon Amendment Binder.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 3-3 in Chapter 3, of Link Canyon Amendment Binder.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 5-2E in Chapter 5, of Link Canyon Amendment Binder.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Replace EIS Soils Map A in Link Canyon Substation No. 2 Soils Report at the back of Appendix 2-6, of Link Canyon Amendment Binder.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Addition to Link Canyon Substation No. 2 revised Soils Report at the back of Appendix 2-6, of Link Canyon Amendment Binder.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add 1999 Raptor Survey at the back of Appendix 3-4, of Link Canyon Amendment Binder.
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
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Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

These updated and additional pages and plates need to be inserted in the Link Canyon Substation Relocation Amendment Binder, dated November 1999.



Application for Permit Processing

Detailed Schedule of Changes to the MRP

Title of Application: AM99G - Link Canyon Substation Relocation Amendment.

Permit Number: ACT/041/002

Complete List of Changes for Original Submittal (11/23/1999), and Second Submittal (02/07/2000).

Mine: SUFCO MINE

Permittee: CANYON FUEL CO., LLC

Provide a detailed listing of all changes to the mining and reclamation plan which will be required as a result of this proposed permit application. Individually list all maps and drawings which are to be added, replaced, or removed from the plan. Include changes of the table of contents, section of the plan, pages, or other information as needed to specifically locate, identify and revise the existing mining and reclamation plan. **Include page, section and drawing numbers as part of the description.**

			DESCRIPTION OF MAP, TEXT, OR MATERIALS TO BE CHANGED
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 1-36 and 1-37 in Chapter 1, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 2-2ii, 2-2iii, 2-2, 2-3, 2-8, and 2-10 to 2-22 in Chapter 2, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 3-6 to 3-7A, and 3-34 to 3-35A in Chapter 3, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 5-v, 5-vi, 5-39, 5-41, 5-42, 5-44, 5-58, 5-58A, 5-66, and 5-67 in Chapter 5, Volume 1 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Pages 7-28 to 29A, 7-47, 7-51 to 7-56, 7-58 to 7-61, 7-69, and 7-73 to 7-75 in Chapter 7, Volume 2 of MRP.
<input type="checkbox"/> ADD	<input checked="" type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Plate 3-3 in Chapter 3, Volume 1 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new Plate 5-2E in Chapter 5, Volume 1 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Link Canyon Substation No. 2 Soil Investigations at the back of Appendix 2-6, Volume 4 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add 1999 Raptor Survey at the back of Appendix 3-4, of Link Canyon Amendment Binder.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Cultural Resource Evaluation addendum at back of Link Canyon Substation evaluation in Appendix 4-2, Volume 6 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new pages of Revised Bond calculations at the front of Appendix 5-9, Volume 6 of MRP.
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new pages of diversion ditch calculations at the back of Appendix 7-12, Volume 10 of MRP
<input checked="" type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	Add new pages of ASCA calculations at the back of Appendix 7-15, Volume 10 of MRP
<input type="checkbox"/> ADD	<input type="checkbox"/> REPLACE	<input type="checkbox"/> REMOVE	
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Any other specific or special instructions required for insertion of this proposal into the Mining and Reclamation Plan?

This form includes all revised pages for the Link Canyon Substation Relocation Amendment originally submitted on November 23, 1999, and the revised pages for the deficiency responses submitted. This form when approved will combine and supersede the Original form submitted on November 23, 1999, and the Second submittal form submitted on February 7, 2000.

